



**Freshfields Bruckhaus Deringer US LLP**

**Via ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**Silicon Valley**  
855 Main Street  
Redwood City, CA 94063  
T +1 650 461 8276 (Direct)  
F +1 202 507 5945  
justina.sessions@freshfields.com  
www.freshfields.com

May 8, 2024

**Re: *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010 (PKC); *Inform Inc. v. Google LLC, et al.*, No. 1:23-cv-01530 (PKC)**

Dear Judge Castel:

We write jointly as counsel for Defendants Google LLC, Alphabet Inc., and YouTube LLC (collectively, “Google”) and Plaintiff Inform, Inc. (“Inform”) in response to Pre-Trial Order No. 11, directing the parties to submit Proposed Orders and final arguments regarding search terms and source code in connection with Inform’s Supplemental Requests for Production of Documents. ECF No. 777 at 1-2. No conference is scheduled.

The parties have had a series of productive discussions in recent days and are working towards a resolution. As to search terms, the parties have reached agreement on an approach that the parties anticipate will resolve all issues. As to source code, the parties are working cooperatively to address the issues raised in Inform’s motion to compel.

The parties therefore respectfully request that the Court withhold ruling on Inform’s motion to compel, ECF No. 751, at this time, in anticipation of the parties’ final resolution and Inform’s withdrawal of the motion. The parties agree to promptly alert the Court if they are unable to reach a complete resolution.

Respectfully submitted,

/s/ Justina Sessions

Justina K. Sessions  
FRESHFIELDS BRUCKHAUS  
DERINGER US LLP  
855 Main Street  
Redwood City, CA 94063  
Telephone: 650-618-9250  
Email: justina.sessions@freshfields.com

*Counsel for Defendants Google LLC,  
Alphabet Inc., and YouTube LLC*

May 8, 2024  
Page 2

/s/ Serina Vash

SERINA M. VASH

New York Bar No.: 2773448

[svash@hermanjones.com](mailto:svash@hermanjones.com)

**HERMAN JONES LLP**

153 Central Avenue, # 131

Westfield, NJ 07090

(404) 504-6516

JOHN C. HERMAN (admitted *pro hac vice*)

[jherman@hermanjones.com](mailto:jherman@hermanjones.com)

**HERMAN JONES LLP**

3424 Peachtree Road, N.E., Suite 1650

Atlanta, GA 30326

(404) 504-6555

(404) 504-6501 (fax)

*Counsel for Plaintiff Inform Inc.*

CC: All Counsel of Record (via ECF)